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Before the
Federal Communications Commission
Washington, DC

MAY 19 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In re Applications of)	MM Docket No. 93-53
)	
KR PARTNERS)	File No. BPH-911001MB
)	
KES COMMUNICATIONS, INC.)	File No. BPH-911003MH
)	
LORI LYNNE FORBES)	File No. BPH-911004MH
)	
For Construction Permit for a)	
New FM Station on Channel 256C)	
in Waimea, Hawaii)	

To: Honorable Joseph P. Gonzalez
Administrative Law Judge

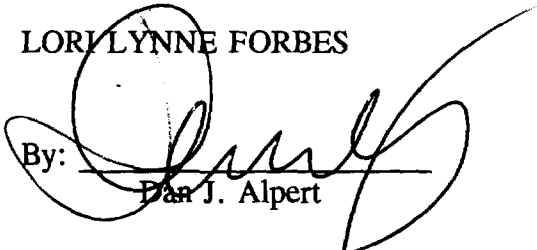
**ERRATA TO OPPOSITION TO MOTION TO ENLARGE ISSUES AGAINST
LORI LYNNE FORBES**

Lori Lynne Forbes ("Forbes"), by her attorney, hereby submits replacement pages for pages 6 and 8 to her submission filed yesterday. Following the filing of the pleading, it was noticed that the document contained two errors which needed to be corrected.

WHEREFORE, it is respectfully requested that the this errata to the "Motion to Enlarge the Issues Against Lori Lynne Forbes" be accepted.

Respectfully submitted,

LORI LYNNE FORBES

By: 
Dan J. Alpert

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May 19, 1993

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was retained by Forbes. He personally is familiar with the transmitter site proposed by Forbes, and personally confirms that although the terrain is irregular at points near the location of the transmitter site in the direction of Waimea, the actual, literal terrain is such that there is no terrain obstruction in the direct path to Waimea. Engineering Statement at 1. In fact, from Waimea, the Forbes transmitter site can be seen.

Terrain Plots

To confirm this visual information, Forbes' Consulting Engineer also conducted three additional studies. First, to ascertain the overall accuracy of KR's Engineering

Company's single terrain plot, Forbes' Consulting Engineer determined the exact location of

onto a short street named Kupai Place, the signal was only fair and not completely clear. I then continued to the end of Laelae Road (also sign reads Laelele) and turned onto Puuki Place, where the signal was barely receivable. The changes appear to follow the direction which my vehicle is driven, and may result from the directional characteristics due to receive antenna mounting. I was about to continue, proceeding through Waimea toward Hilo on Highway 19, when the station abruptly left the air.

Engineering Statement at Attachment 2. The "outages" of service experienced in the direction of Waimea essentially match those predicted by the shadow study, and a signal was received in Waimea, again, just as predicted by the shadow study and the terrain profiles. At the power proposed by Forbes (which is 3800 times that of the "test" translator), a signal level of 80.81 dBu (which is 3.5 times that which is required under the Commission's rules) will be provided over the community of Waimea. Therefore, based upon this on-site study of the local terrain and their effect on local propagation of signals, it has been established that there is no "major obstruction," no inability to provide city-grade service, and there is no lingering question of fact that needs to be resolved in a hearing.

Deficiencies in KR's Study

KR's engineering study appears to have suffered from at three deficiencies. First, its engineer did not enjoy any on-site familiarity with the site and the local terrain that he could factor into his analysis. Second, it is not at all clear that KR's engineer used the proper boundaries for the community of Waimea, and could have instead been evaluating the effect of the local terrain on certain of the areas for lie before, beyond, or to the side of Waimea. A detailed map showing the actual boundaries of Waimea is attached hereto at Figure 2 to the Engineering Statement. Finally, it appears that he inadvertently mixed together two incompatible databases. As stated in Attachment 3, which is a copy of U.S. Geological Survey Bulletin

CERTIFICATE OF SERVICE

I, Dan J. Alpert, hereby certify that the forgoing document has been sent via Hand Delivery on May 19, 1993 to the following:

Hon. Joseph P. Gonzalez
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